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March 21, 2011

*Via Email & Regular Mail*

Hon. Paul A. Crotty, U.S.D.J.  
United States District Court Judge  
United States District Court For The  
Southern District of New York  
500 Pearl Street, Courtroom 20-C  
New York, New York 10007

**USDC SDNY**  
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Re: *Iftikhar Ahmad v. Hartford Life And Accident Insurance Company*  
Civ. Act. No. 10 cv 4545(PAC)(MHD)  
Our File No.: 02489-000081

**MEMO ENDORSED**

Dear Judge Crotty:

This office represents the defendant, Hartford Life and Accident Insurance Company ("Hartford"). We write on behalf of all parties to request a thirty-day extension of time of the current briefing schedule in this matter.

By letter dated March 1, 2011, Plaintiff seeks an order compelling Hartford to produce Johanna Cobb, a Hartford Nurse Consultant, for deposition in Maitland, Florida, and to compel the production of eighty (80) medical reports by two independent medical review consultants regarding disability claims other than plaintiff's claim and Hartford's corresponding decisions after receiving the independent medical consultant reports for those eighty unrelated disability claims. Hartford timely opposed plaintiff's request by letter dated March 4, 2011. Under this Court's order issued January 19, 2011 (Doc. No. 13) the parties must file motions for summary judgment by no later than April 1, 2011.

Given the outstanding discovery dispute, it is respectfully requested that the Court grant a further thirty-day extension of the time to file motions for summary judgment. The Court set a briefing schedule on December 14, 2010. (Doc. No. 11). By Order dated January 19, 2011, the Court granted a further extension of time of discovery to complete depositions and to produce confidential documents. (Doc. No. 13). Plaintiffs received all of the confidential documents and took the depositions of the Investigative Analyst and Appeals Specialist. Plaintiffs seek to compel the additional discovery, which Hartford opposes. Allowing the thirty-day extension of time for summary judgment motions is expected to provide sufficient time to resolve this issue with the Court and to complete all remaining discovery, if any.

**MEMO ENDORSED**

Hon. Paul A. Crotty, U.S.D.J.

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Accordingly, the parties respectfully request that current scheduling order be extended as follows:

<i>Description</i>	<i>Original Date</i> (Doc. No. 11)	<i>Amended Date</i> (Doc. No. 13)	<i>Proposed Date</i>
Last day to file motion for summary judgment	3/2/2011	4/1/2011	5/2/2011 ✓
Last day to file opposition to motion for summary judgment	3/30/2011	5/2/2011	6/3/2011 ✓
Last reply brief on motion to summary judgment	4/18/2011	5/16/2011	6/17/2011 ✓

Thank you for your consideration of this matter.

Respectfully submitted,



Michael H. Bernstein

John T. Seybert

Sedgwick, Detert, Moran & Arnold LLP

JTS/jts

cc: Scott M. Riemer, Esq. (via email)

21 MAR 2011

SO ORDERED:



HON. PAULA A. CROTTY  
UNITED STATES DISTRICT JUDGE